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Attorneys for Plaintiffs Justin James and Nicole James

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JUSTIN JAMES and NICOLE JAMES;

Case No. 08-CV-0397-BR

Plaintiffs,

v.

FREMONT REORGANIZING
COMPANY, fka FREMONT
INVESTMENT & LOAN COMPANY,
a California corporation; BRIDGE
CAPITAL CORPORATION, a
California corporation; HSBC BANK
USA, NA, a national banking
association,

PLAINTIFFS' MOTION FOR ENTRY
OF DEFAULT AGAINST
DEFENDANT HSBC BANK USA, NA

Defendants.

L.R. 7.1 Certificate of Compliance

Pursuant to L.R. 7.1, plaintiffs' counsel certified that the corporate defendant HSBC Bank USA, NA, is in default. Plaintiffs' counsel has attempted to contact an in-house attorney for

HSBC Bank USA, NA, but has not yet reached her and does not know if HSBC Bank USA, NA is represented in this matter. Defendant Fremont Reorganizing Company consents to the filing of this motion.

Motion:

Pursuant to FRCP 55, Plaintiffs move the Court for entry of an order of default against Defendant HSBC Bank USA, NA, it appearing from the records that Defendant was duly served with summons and complaint on April 10, 2009, and has failed to file an answer or make any other appearance in the referenced action within the time prescribed by law.

DATED this 2nd day of June, 2009.

Respectfully submitted,

OREGON LAW CENTER

By: /s/ Hope A. Del Carlo
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Of Attorneys for Plaintiffs